

Willie E. Dennis
6858 Hidden Glade Place
Sanford, Florida 32771
woc2020@gmail.com
(518) 414-7163

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/25/2025
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June 18, 2025

Via ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Dennis v. K&L Gates LLP, et al., No. 1:20-cv-09393-MKV
Request for Court Assistance in Obtaining Administrative Confirmation from AAA

Dear Judge Vyskocil:

I respectfully submit this letter in connection with the Court's June 12, 2025 Order [ECF No. 113], which granted me a final extension until August 4, 2025 to file my opposition to Defendants' motion to dismiss.

In preparing that submission, I require factual confirmation from the American Arbitration Association ("AAA") regarding certain procedural matters in the arbitration captioned Dennis v. K&L Gates LLP, AAA Case No. 01-21-0002-7637. Specifically, I have requested that the AAA confirm the date(s) and method(s) of delivery of the final arbitration award. This information is necessary for determining statutory deadlines under 10 Del. C. § 5714 and to confirm compliance with AAA Commercial Arbitration Rule R-47(c), which—along with 10 Del. C. § 5713—requires delivery to be effected by a neutral party.

Despite submitting a formal request to the AAA on May 5, 2025 (prior to my hospitalization and surgery), and following up on June 13 and June 17, 2025, I have not received any response. (See Exhibit A.) In this case and a related matter pending before the D.C. Superior Court, Defendants have submitted filings asserting delivery dates that I cannot verify or challenge without confirmation from the AAA itself. Because the AAA is the only entity in possession of these procedural facts, I respectfully request the Court's assistance in obtaining that confirmation.

In my most recent submission to the AAA, I explained the health-related urgency of this request as follows:

"I share this information to respectfully explain the current limitations on my ability to respond promptly to court orders in related proceedings. I am undergoing intensive rehabilitation and continue to experience constant pain. To manage that pain, I have been prescribed narcotic medications, which impair my cognitive function and require me to rest for significant portions of the day. These medical circumstances severely limit the time I am able to dedicate to preparing legal filings."

Federal and state courts have recognized that judicial inquiry into procedural matters such as delivery of arbitration awards is appropriate where those matters bear directly on statutory timelines or the validity of post-award proceedings. See *SPX Corp. v. Garda USA Inc.*, 94 A.3d 745, 749 (Del. 2014) (DUAA deadlines are not triggered absent proper delivery); *Bell Aerospace Co. v. Local 516, UAW*, 500 F.2d 921, 923 (2d Cir. 1974) (court may examine procedural regularity of arbitration); *Legion Ins. Co. v. Ins. Gen. Agency*, 822 A.2d 1271, 1273 (Del. 2003) (valid service under 10 Del. C. § 5713 is prerequisite for post-award deadlines).

As a pro se litigant, I am also currently unable to access the AAA case records through its online system, despite

repeated requests and correspondence. (See Exhibit A) These records contain time-sensitive and material information regarding award delivery, the timing of my modification request, and other key notices. Without this access or confirmation from the AAA, I am left to respond to Defendants' representations regarding timeliness and jurisdiction without a complete factual record. This severely prejudices my ability to comply with court orders and raises significant concerns of fairness and due process.

Accordingly, I respectfully request that the Court issue a directive or letter to the AAA, asking that it:

1. Confirm in writing the date(s) and method(s) of delivery of the final arbitration award (and any modification) in AAA Case No. 01-21-0002-7637;
2. Confirm whether delivery was effected by the AAA or the arbitrator, as required under AAA Rule R-47(c) and 10 Del. C. § 5713;
3. Confirm receipt of my February 26, 2025 submission requesting an investigation into the arbitrator's neutrality (solely to establish record delivery);
4. Produce copies of any non-privileged and non-confidential documents in its possession related to the administrative handling or delivery of the final award, pursuant to AAA Rule R-53; and
5. Restore my access to the arbitration case file through the AAA's online system, or provide an alternative means of access, to enable timely compliance with this Court's August 4, 2025 deadline.

All of these items were requested in my correspondence to the AAA dated May 5, June 13, and June 17, 2025.

I thank the Court for its continued attention to this matter and respectfully submit this request in the interest of procedural fairness and judicial efficiency.

Respectfully submitted,
/s/ Willie E. Dennis
Willie E. Dennis
Pro Se Plaintiff

cc:Kathleen McKenna, Esq (Via ECF & e-mail)
Rachel Fisher, Esq, (Via ECF & e-mail)
Julia Hollreiser, Esq (Via ECF & e-mail)
Guy Brenner, Esq (Via ECF & e-mail)

Plaintiff's request seeking to have the Court issue an Order or letter directing the American Arbitration Association ("AAA") to confirm information and provide documentation is DENIED.

SO ORDERED.

Date: 6/25/2025
New York, New York

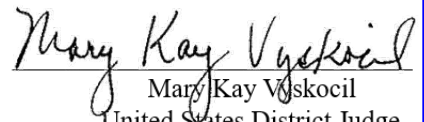

Mary Kay Vyskocil
United States District Judge

Exhibit A

Request by Pro-Se Plaintiff to the AAA for Clarification and Support on Key Administrative Matters, dated May 5, 2025 and June 13 and June 17, 2024

Willie E. Dennis
6858 Hidden Glade Place
Sanford, Florida 32771
woc2020@gmail.com
(518) 414-7163

June 13, 2025

Via Email
The Honorable Bridget Mary McCormack
President and Chief Executive Officer
American Arbitration Association
bridgetmccormack@adr.org

Board of Directors
American Arbitration Association
c/o Bridget McCormack
bridgetmccormack@adr.org

Re: Follow-Up Request for Clarification and Support on Key Administrative Matters

Willie E. Dennis v. K&L Gates LLP, AAA Case No. 01-21-0002-7637
Related Cases: Dennis v. K&L Gates LLP, No. 1:20-cv-09393-MKV (S.D.N.Y.); Dennis v. K&L Gates LLP et al., No. 2025-CAB-002634 (D.C. Sup. Ct.)

Dear Ms. McCormack and Members of the Board,

I hope this message finds you well. I am writing respectfully to follow up on my letter dated May 5, 2025, regarding the award issued by Arbitrator Clinkscale in the above-referenced matter. I recognize the many demands on your time and sincerely appreciate your attention to this request, which has taken on greater urgency due to time-sensitive obligations in two ongoing court proceedings.

To aid my full and timely compliance with judicial directives, I am seeking the AAA's assistance and clarification on a few important administrative matters that are uniquely within your authority to confirm:

I. Clarification on Date and Manner of Award Delivery

I respectfully request confirmation of the date(s) and method(s) by which the award—and any subsequent modification—was formally delivered to the parties. This information is critical to pending court submissions, as both the Southern District of New York and the Superior Court for the District of Columbia are presently evaluating deadlines that turn on this issue.

II. Acknowledgment of February 26, 2025 Submission Requesting Investigation

I also respectfully request confirmation of receipt of my February 26, 2025 request for an investigation into the independence of Arbitrator Clinkscale. A copy is attached. This confirmation is sought solely to establish delivery for court record purposes.

III. Request for Documents Under Rule R-53

I request the production of any non-privileged and non-confidential documents in the AAA's possession related to the arbitration, as permitted under AAA Rule R-53.

IV. Assistance with Online Record Access

I have been unable to access arbitration records via the AAA portal. I have communicated with and have received no response. I respectfully request assistance in restoring access or facilitating alternative delivery of those documents.

Clarification of Scope and Purpose

For the avoidance of doubt, I wish to emphasize that this request is not an attempt to reopen or challenge the merits of the arbitration award, nor is it intended to seek privileged or deliberative materials. I am solely requesting administrative confirmation of neutral delivery and procedural compliance, which are matters of record uniquely within the AAA's possession. These facts are necessary for me to comply with court orders and protect my rights under applicable law.

V. Requested Response by June 16, 2025

In light of pending court deadlines, I respectfully request your response by Tuesday, June 16, 2025. I appreciate your assistance and thank you for your attention to this urgent administrative matter.

Respectfully,
/s/ Willie E. Dennis
Willie E. Dennis
Pro Se Party

cc: Office of the General Counsel
American Arbitration Association
[\[legal@adr.org\]](mailto:legal@adr.org)

cc: India Johnson, Director Emeritus

cc: Hon. Bruce Myerson, Director

cc: Edna Sussman, Director

cc: James R Jenkins, Director

cc: Tracey B. Frisch, Executive Director of the AAA-ICDR Foundation.

cc: Marilyn Duffy Grande, Non-Director, Consultant for the AAAICDR Foundation. cc: Please distribute to the Directors

Willie E. Dennis
6858 Hidden Glade Place
Sanford, Florida 32771
woc2020@gmail.com
(518) 414-7163

June 17, 2025

Via Email
The Honorable Bridget Mary McCormack
President and Chief Executive Officer
American Arbitration Association
bridgetmccormack@adr.org

Board of Directors
American Arbitration Association
c/o Bridget McCormack
bridgetmccormack@adr.org

Re: Combined Follow-Up on Prior Request and Updated Health-Related Urgency Willie E. Dennis v. K&L Gates LLP, AAA Case No. 01-21-0002-7637 Related Cases:
Dennis v. K&L Gates LLP, No. 1:20-cv-09393-MKV (S.D.N.Y.) Dennis v. K&L Gates LLP et al., No. 2025-CAB-002634 (D.C. Sup. Ct.)

Dear Ms. McCormack and Members of the Board,

I write respectfully to follow up on my request dated June 13, 2025.

On May 9, I suffered a serious fracture to my right femur. Surgery was performed on May 11, but complications—including newly diagnosed cardiac issues—prolonged my hospitalization. I was discharged from AdventHealth on May 22. My cardiologist has since determined that my heart function has decreased to 25%, and I have been instructed to wear a defibrillator vest at all times. (Please see the attached discharge summary.)

I share this information to respectfully explain my current limitations in responding promptly to court orders in related proceedings. I am undergoing intensive rehabilitation and continue to experience constant pain. To manage that pain, I have been prescribed narcotic medications, which impair cognitive function and require extended periods of rest. These medical conditions significantly restrict the time and capacity I can dedicate to preparing legal filings.

Given these constraints, delays in receiving administrative information or access to the arbitration record materially prejudice my ability to comply with judicial directives. The longer I go without the requested materials, the greater the advantage afforded to K&L Gates.

As of today, I have still not received a response from AAA Customer Service regarding my repeated requests for access to the case filings from the arbitration. I have attached the most recent request as Exhibit A. I would be sincerely grateful for any assistance you can provide to facilitate access to these online records.

Additionally, I received a letter yesterday from Vengroff Williams, Inc. seeking payment of \$2,572.50 for an allegedly past due amount owed to the AAA (Exhibit B). I was surprised to receive this collection notice, as the AAA has not fulfilled several of its obligations under our arbitration agreement—including providing me with access to the full record of filings and the non-privileged documents required under Rule 53. These materials are necessary for me to comply with ongoing, time-sensitive court procedures. Until these issues are resolved, I respectfully request that you instruct Vengroff Williams to suspend its collection efforts.

Finally, I would like to note that although I have previously discussed my financial hardship with Ms. Corsetti, she never advised me that the AAA has discretion to grant relief under its Administrative Fee Schedule in cases of demonstrated hardship. Furthermore, Rule R-54 provides the AAA with discretion to allocate administrative fees based on the specific circumstances of a case. In light of this, I am submitting under separate cover a formal request for a fee waiver or reduction due to financial hardship. Please let me know if any additional information is needed in support of that request.

Thank you for your time, attention, and any assistance you are able to offer.

Respectfully,
/s/Willie E. Dennis
Willie E .Dennis

cc:

Eric Tuchmann, General Counsel, American Arbitration Association India Johnson, Director Emeritus Hon. Bruce Myerson, Director Edna Sussman, Director James R. Jenkins, Director Tracey B. Frisch, Executive Director, AAA-ICDR Foundation Marilyn Duffy Grande, Consultant, AAA-ICDR Foundation Please distribute to all Board Members

Exhibit A

Request to AAA For Access to Online Records Inconnection with Judicial Proceedings

----- Forwarded message -----

From: **Willie Dennis** <woc2020@gmail.com>

Date: Tue, 17 Jun 2025 at 3:29 PM

Subject: Re: Ticket: ##RE-500001391##: "Willie E. Dennis v. K&L Gates LLP, AAA Case No. 01-21-0002-7637" has been opened

To: AAA Customer Service <CustomerService@adr.org>

Good afternoon .

Checking in Because of my obligations in two related ongoing court proceedings, time is of the essence. I have not heard from you since Friday, June 13.

Please

Thank you.

Willie E Dennis.

On Fri, 13 Jun 2025 at 9:04 AM AAA Customer Service <CustomerService@adr.org> wrote:

Hi Willie Dennis,

Ticket: 500001391

Your **New** ticket, "Willie E. Dennis v. K&L Gates LLP, AAA Case No. 01-21-0002-7637" has been received.

Description:

*** External E-Mail – Use Caution ***

Good Morningthe

I wrote yesterday. I am still unable to access documents online. Dashboard shows file is empty. I need access to the documents due to time-sensitive obligations in two related ongoing court proceedings.

Please advise how I can access my documents in the file.to comply with court deadlines.

Thank you

Willie E. Dennis
Pro-Se Plaintiff
518-414-7163

Your ticket has been assigned to the appropriate IS engineer. You will be contacted if additional information is needed or once your issue has been resolved.

If you have any questions, please contact Customer Support.

Thank you,



AAA Customer Service

American Arbitration Association

E: CustomerService@adr.org

adr.org | icdr.org | aaaicdrfoundation.org



The information in this transmittal (including attachments, if any) is privileged and/or confidential and is intended only for the recipient(s) listed above. Any review, use, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.

Exhibit R
Venoroff Williams

VENGROFF WILLIAMS, INC.
P.O. Box 4155
Sarasota, FL 34230

Phone: (714) 787-1467
Fax: (657) 223-6356
Se habla español

CREDITOR AMERICAN ARBITRATION ASSOC.	
ACCOUNT #	REFERENCE #
01-21-0002-7637-1	4635496
DATE	BALANCE DUE
June 12, 2025	\$2,572.50

MDG2025 00000631 01



Willie E Dennis
6858 Hidden Glade Pl
Sanford FL 32771

As an alternative to mailing payment you may
pay online or over the phone:

Pay online at www.payvw.com or by phone at 877-682-6141

Enter 46354965 as your User ID and 549429 as your Password.

Vengroff Williams is a debt collector. We are trying to collect a debt that you owe to AMERICAN ARBITRATION ASSOC..
We will use any information you give us to help collect the debt.

Our information shows:

You have a past due account with AMERICAN
ARBITRATION ASSOC. with account number 01-21-0002-
7637-1

As of 06/04/25, you owed: \$2,572.50

Between 06/04/25 and today:

You were charged this amount in interest: + \$ 0.00

You were charged this amount in fees: + \$ 0.00

You paid or were credited this amount
towards the debt:

\$ 0.00

Total amount of debt now: \$2,572.50

How can you dispute the debt?

Please call or write to us by July 27, 2025, to dispute all or part of the
debt. If you do not, we will assume that our information is correct.

- If you write to us by July 27, 2025, we must stop collection on
any amount you dispute until we send you information that shows
you owe the debt. You may use the form below or write to us
without the form. You may also include supporting documents. We
accept disputes electronically at disputes@vwinc.com.

What else can you do?

- Write to ask for the name and address of the original creditor, if
different from the current creditor. If you write by July 27, 2025 we
must stop collection until we send you that information. You may use the
form below or write to us without the form. We accept such requests
electronically at disputes@vwinc.com.
- Go to www.cfpb.gov/debt-collection to learn more about your
rights under federal law. For instance, you have the right to stop or
limit how we contact you.
- Contact us about your payment options. Póngase en contacto con
nosotros para solicitar una copia de este formulario en español.

Notice: See reverse side for important disclosure information.

How do you want to respond?

Check all that apply:

☐ I want to dispute the debt because I think:

- ☐ This is not my debt.
- ☐ The amount is wrong.
- ☐ Other (please describe on reverse or
attach additional information).

☐ I want you to send me the name and address of the original creditor.

☐ I enclosed this amount: \$ _____

Make your check payable to Vengroff Williams, Inc. Include the
reference number 4635496. As an alternative to mailing payment,
you may pay online or over the phone.

CREDITOR: AMERICAN ARBITRATION ASSOC.
ACCOUNT #: 01-21-0002-7637-1
REFERENCE #: 4635496
AMOUNT DUE: \$2,572.50

PAYMENT OPTIONS:

1. Mail your check or money order with this Coupon
2. Pay online at www.payvw.com or by phone at 877-682-6141
Enter 46354965 as your User ID and 549429 as your Password
3. Call our office at (714) 787-1467 to setup payment arrangements

VENGROFF WILLIAMS, INC.
DEPT 500
PO BOX 4478
Houston TX 77210-4478